APPENDIX A

Legal Descriptions of the Land Parcels Constituting the Smurfit-Stone Mill Site

Legal Descriptions of the Land Parcels Constituting the Smurfit-Stone Mill Site

- S11, T14 N, R21 W, IN N2 & E2 & IN S2 & RR RIGHT OF WAY IN N2 & SE4
- S11, T14 N, R21 W, NW4 NW4 OF SEC 11
- S02, T14 N, R21 W, PLAT C5/C5-1, PARCEL XXX, IN SE4 SW4 W OF R/W PLAT C5 23.32AC & RR R/W IN SE4 SW4 PLAT C5-1 3.26AC 2-14-21 TOTAL 26.58AC
- S12, T14 N, R21 W, PLAT D',B2,C, PARCEL XXX, IN W2 SW4 & IN NW4 WEST OF MULLAN RD 12-14-21
- S10, T14 N, R21 W, PLAT C, PARCEL XXX, IN NE4 PLAT C 10-14-21 10.73AC
- S14, T14 N, R21 W, PLAT A&A'&B, PARCEL XXX, IN N2 PLAT A, A' & B 192.72AC**RR R/W IN E2 NE4 PLAT C' 3.56AC**IN E2 & E2 SW4 PLAT C 319.53AC 14-14-21 TOTAL 515.63AC
- IN NW4 PLATS A' & B 123.43AC & IN W2 PLA TS C & H 106AC & RR R/W IN W2 PLAT C' 9.51AC & IN SW4 SE4 PLAT I & J 1.79AC TOTAL 240.73AC
- S13, T14 N, R21 W, TRACT A COS 3220 IN SE4 & E2 SW4 E OF CO RD W2 SW4 W OF RR 169.99AC
- IN E2 PLATS E & G 251.08AC & IN S2 PLATS A & C 94.68AC & IN W2 PLAT B 218AC & RR R/W IN NW4 & SE4 PLAT C' 13.09AC 24-14-21 TOTAL 576.85AC
- S13, T14 N, R21 W, PLAT C & B, PARCEL XXX, IN SE4 SW4 PLAT C 13-14-21 & IN E2 NW4 PLAT B 24-14-21 PLANT SITE 69AC
- S19, T14 N, R20 W, PT LOTS 3 & 4 19-14-20
- S23, T14 N, R21 W, PLAT B, PARCEL XXX, IN E2 & E2 NW4 PLAT B 23-14-21 400AC
- W2 & TR A IN W2 NE4 LESS R/W, DITCH & PT SOLD PLATS A & E 395.63AC & RR R/W & TR C IN NE4 LESS PT SOLD PLATS C1 & E3 33.21AC 25-14-21 TOTAL 428.84A

APPENDIX B

PA Report Form 2050-0095

OMB Approval Number: 2050-0095
Approved for Use Through: 1/92

EPA Potential Hazardous Waste Site Preliminary Assessment Form

Identification

MTN000802850

State	Site Number

CERCLIS Discovery Date: 5/10/2011

1. General Site Information

Name:	Street Address:				
Smurfit-Stone Mill	14377 Pulp Mill Road				
City: Missoula	State: Montana	Zip Code: 59808-9602	County: Missoula	Co. Code	Cong. Dist: 00
Latitude: 46°57' 50.22"	Longitude: 114°12' 02.71"	Approximate Area of Site: 3,200 Acres _____ Square Feet		Status of Site: ■ Active ▯ Inactive ■ Not Specified ■ NA (GW, plume, etc.)	

2. Owner/Operator Information

Owner: M2 Green Redevelopment LLC			Operator: same		
Street Address: 601 East 3rd Street, Suite 302			Street Address:		
City: Alton			City:		
State: IL	Zip Code: 62002-6318	Telephone: 618-304-0130	State:	Zip Code:	Telephone

Type of Ownership:
- ▯ Private
- ■ Federal Agency
  Name _____
- ■ State
- ■ Indian
- ■ County
- ■ Municipal
- ■ Not Specified
- ■ Other _____

How Initially Identified:
- ■ Citizen Complaint
- ■ PA Petition
- ▯ State/Local Program
- ■ RCRA, CERCLA Notification
- ■ Federal Program
- ■ Incidental
- ■ Not Specified
- ■ Other _____

3. Site Evaluator Information

Name of Evaluator: Jeff Miller	Agency/Organization: URS Operating Services - Region 8 START		Date Prepared: July 5, 2011	
Street Address: 1099 18th St., Suite 710		City: Denver		State: Colorado
Name of EPA or State Agency Contact: Robert Parker, Site Assessment Manager		Street Address: 1595 Wynkoop Street		
City: Denver		State: Colorado	Telephone: 303-312-6664	

4. Site Disposition (for EPA use only)

Emergency Response/Removal Assessment Recommendation:	CERCLIS Recommendation:	Signature:
■ Yes ■ No Date _____	■ Higher Priority SI ■ Lower Priority SI ■ NFRAP ■ RCRA ■ Other _____ Date _____	Name (typed): Position:

EPA

Potential Hazardous Waste Site
Preliminary Assessment Form - Page 2 of 4

CERCLIS Number:
MTN000802850

5. General Site Characteristics

Predominant Land Uses Within One Mile of Site(Check all that apply):
- ■ Industrial
- ■ Commercial
- ■ Residential
- ■ Forest/Fields
- ■ Agricultural
- ■ Mining
- ■ DOD
- ■ DOE
- ■ DOI
- ■ Other Federal Facility
- ■ Other _____

Site Setting:
- ■ Urban
- ■ Suburban
- ■ Rural

Years of Operation:
Beginning Year 1957
Ending Year 2010
☐ Unknown

Type of Site Operations (Check all that apply):
- ■ Manufacturing (must check subcategory)
  - ■ Lumber and Wood Products
  - ☐ Inorganic Chemicals
  - ■ Plastic and/or Rubber Products
  - ☐ Paints, Varnishes
  - ☐ Industrial Organic Chemicals
  - ☐ Agricultural Chemicals (e.g., pesticides, fertilizers)
  - ☐ Miscellaneous Chemical Products (e.g., adhesives, explosives, ink)
  - ☐ Primary Metals
  - ☐ Metal Coating, Plating, Engraving
  - ☐ Metal Forging, Stamping
  - ☐ Fabricated Structural Metal Products
  - ☐ Electronic Equipment
  - ☐ Other Manufacturing
- ☐ Mining
  - ☐ Metals
  - ☐ Coal
  - ☐ Oil and Gas
  - ☐ Non-metallic Minerals
- ☐ Retail
- ■ Recycling
  - ■ Junk/Salvage Yard
  - ■ Municipal Landfill
  - ■ Other Landfill
- ☐ DOD
- ☐ DOE
- ☐ DOI
- ☐ Other Federal Facility _____
- ☐ RCRA
  - ☐ Treatment, Storage, or Disposal
  - ☐ Large Quantity Generator
  - ■ Small Quantity Generator
  - ☐ Subtitle D
    - ☐ Municipal
    - ☐ Industrial
  - ☐ "Converter"
  - ☐ "Protective Filer"
  - ☐ "Non- or Late Filer"
- ☐ Not Specified
- ☐ Other _____

Waste Generated:
- ■ On site
- ■ Off-site
- ■ On site and off-site

Waste Deposition Authorized By:
- ☐ Present Owner
- ■ Former Owner
- ■ Present & Former Owner
- ☐ Unauthorized
- ■ Unknown

Waste Accessible to the Public:
- ■ Yes
- ☐ No (on site)
- ■ Unknown if off-site disposal is accessible to public.

Distance to Nearest Dwelling, School, or Workplace:

~3,500 Feet from mill facility (but within property boundaries of mill site)

Nearest school: Frenchtown Elementary, 3 miles north

6. Waste Characteristics Information

Source Type: (Check all that apply)	Source Waste Quantity: (Include units)	Tier*:
■ Landfill	16 acres	A
■ Surface Impoundment	979 acres	A
☐ Drums		
☐ Tanks and Non-Drum Containers		
☐ Chemical Waste Pile		
■ Scrap Metal or Junk Pile	unknown	A
☐ Tailings Pile		
☐ Trash Pile (open dump)		
■ Land Treatment	unknown	A
■ Contaminated Groundwater Plume (unidentified source)	suspected, but unknown	
■ Contaminated Surface Water/Sediment (unidentified source)	suspected, but unknown	
■ Contaminated Soil		
☐ Other _____		
☐ No Sources		

* C = Constituent W = Waste stream V = Volume A = Area

General Types of Waste (Check all that apply)
- ■ Metals
- ■ Organics
- ■ Inorganics
- ■ Solvents
- ☐ Paints/Pigments
- ☐ Laboratory/Hospital Waste
- ☐ Radioactive Waste
- ■ Construction/Demolition Waste
- ☐ Pesticides/Herbicides
- ■ Acids/Bases
- ■ Oily Waste
- ■ Municipal Waste
- ☐ Mining Waste
- ☐ Explosives
- ■ Other: Asbestos

Physical State of Waste as Deposited (Check all that apply):
- ■ Solid
- ■ Liquid
- ■ Sludge
- ■ Gas
- ☐ Powder

CERCLIS Number:
MTN000802850

7. *Groundwater Pathway*

Is Groundwater Used for Drinking Water Within 4 Miles?
- ■ Yes
- □ No

Type of Drinking Water Wells Within 4 Miles (Check all that apply):
- ■ Municipal
- ■ Private
- □ None

Is There a Suspected Release to Groundwater?
- ■ Yes
- □ No

Have Primary Target Drinking Water Wells Been Identified?
- □ Yes
- ■ No

If yes, Enter Primary Target Population: _____ People

Depth to Shallowest Aquifer: 3 - 20 feet

Karst Terrain/Aquifer Present:
- □ Yes
- ■ No

Nearest Designated Wellhead Protection Area:
- □ Underlies Site
- □ > 0 - 4 Miles
- ■ None Within 4 Miles

List Secondary Target Population Served by Groundwater Withdrawn From:

0 – 1/4 Mile unk
> ¼ - 1/2 Mile
> 1/2 - 1 Mile
> 1 - 2 Miles
> 2 - 3 Miles
> 3 - 4 Miles
Total Within 4 Miles

Nearest public supply well is on mill property. Approximately 0.25 miles from core industrial area.

8. *Surface Water Pathway*

Type of Surface Water Draining Site and 15 Miles Downstream (Check all that apply):
- ■ Stream ■ River ■ Pond □ Lake
- □ Bay □ Ocean □ Other _____

Shortest Overland Distance From Any Source To Surface Water:
100 Feet
_____ Miles

Is There a Suspected Release to Surface Water?
- ■ Yes
- □ No

Site is Located in:
- ■ Annual - 10-year Floodplain
- ■ > 10-year - 100-year Floodplain
- □ > 100-year - 500-year Floodplain
- □ > 500-year Floodplain

Drinking Water Intakes Located Along the Surface Water Migration Path:
- □ Yes
- ■ No

Have Primary Target Drinking Water Intakes Been Identified:
- □ Yes
- ■ No

If Yes, Enter Population Served by Primary Target Intakes: _____ People

List All Secondary Target Drinking Water Intakes:

Name	Water Body	Flow (cfs)	Population Served

Total within 15 miles _____

Fisheries Located Along the Surface Water Migration Path:
- ■ Yes
- □ No

Have Primary Target Fisheries Been Identified:
- ■ Yes
- ■ No

List All Secondary Target Fisheries:

Water Body/Fishery Name	Flow (cfs)
Clark Fork River	5,293
O'Keefe Creek	unk

CERCLIS Number: MTN000802850

8. Surface Water Pathway (continued)

Wetlands Located Along the Surface Water Migration Path:
- [x] Yes
- [ ] No

Have Primary Target Wetlands Been Identified:
- [x] Yes
- [ ] No

List Secondary Target Wetlands:

Water Body	Flow (cfs)	Frontage Miles
Clark Fork	5,293	>8*

*could be significantly higher if emergent hydrophytes are present in unconsolidated shore riverine wetlands

Other Sensitive Environments Located Along the Surface Water Migration Path:
- [ ] Yes
- [x] No

Have Primary Target Sensitive Environments Been Identified:
- [ ] Yes
- [x] No

List Secondary Target Sensitive Environments:

Water Body	Flow (cfs)	Sensitive Environment Type

9. Soil Exposure Pathway

Are People Occupying Residences or Attending School or Daycare On or Within 200 Feet of Areas of Known or Suspected Contamination:
- [ ] Yes
- [x] No

If Yes, Enter Total Resident Population:

_____ People

Number of Workers On Site:
- [ ] None
- [x] 1 - 100
- [ ] 101 - 1,000
- [ ] >1,000

Have Terrestrial Sensitive Environments Been Identified On or Within 200 Feet of Areas of Known or Suspected Contamination?
- [ ] Yes
- [x] No

If Yes, List Each Terrestrial Sensitive Environment:

10. Air Pathway

Is There a Suspected Release to Air:
- [ ] Yes
- [x] No

Enter Total Population On or Within:

On Site	0
0 - ¼ Mile	241
>¼ - ½ Mile	218
>½ Mile - 1 Mile	85
>1 - 2 Miles	838
>2 - 3 Miles	1,836
>3 - 4 Miles	1,030
Total Within 4 Miles	4,248

Wetlands Located Within 4 Miles of the Site:
- [x] Yes
- [ ] No

Other Sensitive Environments Located Within 4 Miles of the Site:
- [ ] Yes
- [x] No

List All Sensitive Environments Within ½ Miles of the Site:

Distance	Sensitive Environment Type/Wetlands Area (acres)
On Site	wetlands (986 acres within mill boundary in ponds)
0 - 1 Mile	wetlands (605 acres)
> 1 - ½ Mile	wetlands (420 acres)

APPENDIX C

CERCLA Eligibility Worksheet

CERCLA Eligibility Worksheet

Site Name Smurfit Stone Mill

City Missoula State Montana

EPA ID Number MTN000802850

Note: The site is automatically CERCLA eligible if it is a federally owned or operated RCRA site.

I. CERCLA Eligibility

Did the facility cease operations prior to November 19, 1980? NO

If YES, then STOP. The facility is probably a CERCLA site.
If NO, continue to part II

II. RCRA Deferral Factors

Did the facility file a RCRA Part A application? inactive

If YES:

1. Does the facility currently have interim status? _____
2. Did the facility withdraw its Part A application? _____
3. Is the facility a known or possible protective filer? (filed in error) _____
4. Does the facility have a RCRA operating or post closure permit? _____
5. Is the facility a late (after 11/19/80) or non-filer that has been identified by the EPA or the state? (facility did not know it needed to file under RCRA) _____

Type of facility:

Generator_____ Transporter____ Recycler_____
TSD (Treatment/Storage/Disposal)_____

If all answers to questions 1, 2, and 3 are NO, STOP. The facility is a CERCLA eligible site.

If answer to #2 or #3 is YES, STOP. The facility is a CERCLA eligible site.

If answer to #2 and #3 are NO and any other answer is YES, site is RCRA, continue to part III.

III. RCRA Sites Eligible for the NPL

Has the facility owner filed for bankruptcy under federal or state laws? YES

Has the facility lost RCRA authorization to operate or shown probable unwillingness to carry out corrective action? _____

Is the facility a TSD that converted to a generator, transporter or recycler facility after November 19, 1980? _____

IV. Exempted substances:

Does the release involve hazardous substances other than petroleum? YES

V. Other programs: The site may never reach the NPL or be a candidate for removal. We need to be able to refer it to any other programs in EPA or state agencies which may have jurisdiction, and thus be able to effect a cleanup. Responses should summarize available information pertaining to the question. Include information in existing files in these programs as part of the PA. Answer all that apply.

Is there an owner or operator?

NPDES-CWA: Is there a discharge water containing pollutants with surface water through a point source (pipe, ditch, channel, conduit, etc.)?

CWA (404): Have fill or dredged material been deposited in a wetland or on the banks of a stream? Is there evidence of heavy equipment operating in ponds, streams or wetlands?

UIC-SDWA: Are fluids being disposed of to the subsurface through a well, cesspool, septic system, pit, etc.?

TSCA: Is it suspected that there are PCB's on the site which came from a source with greater than 50 ppm PCB's such as oil from electrical transformers or capacitors?

FIFRA: Is there a suspected release of pesticides from a pesticide storage site? Are there pesticide containers on site?

RCRA (D): Is there an owner or operator who is obligated to manage solid waste storage or disposal units under state solid waste or groundwater protection regulations?

UST: Is it suspected that there is a leaking underground storage tank containing a product which is a hazardous substance or petroleum?

APPENDIX D

Photolog

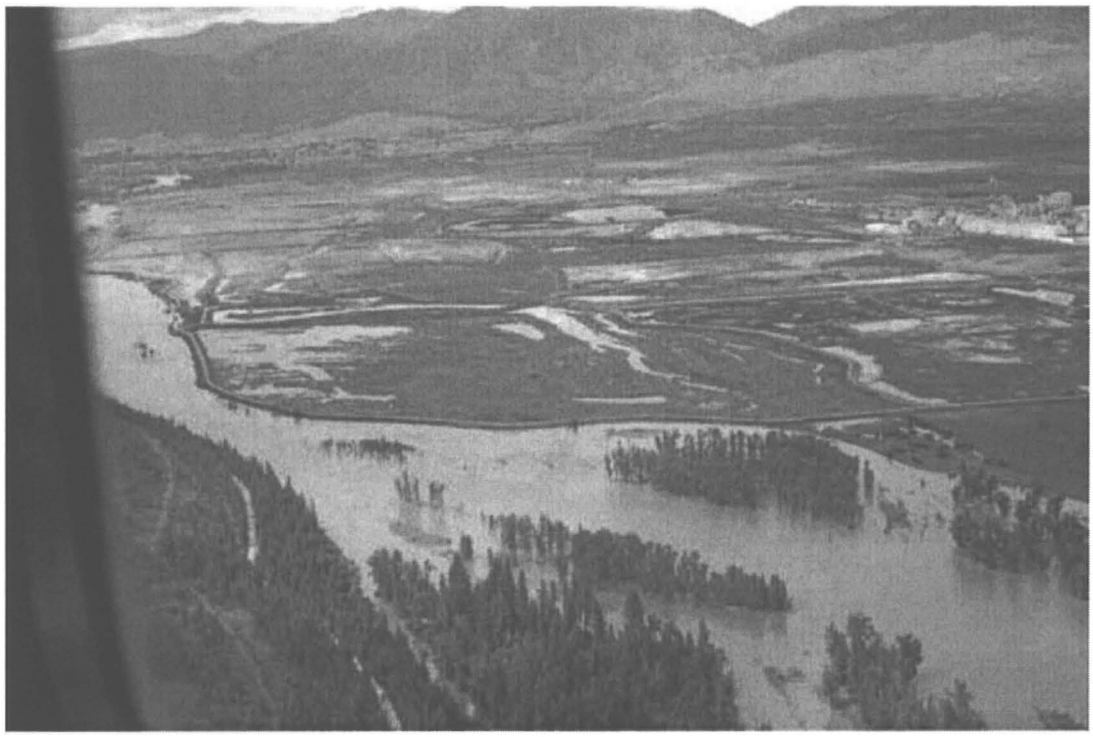


Photo 1
Aerial shot of Clark Fork River and mill property, mill facility on far right, looking north.
06/10/2011

Photo 2
Aerial shot of mill with sludge ponds in middle ground, looking west.
06/10/2011

Photo 3
Aerial shot of sludge ponds 3 (bottom middle) 5 (top left) and 4 (top right),
with effluent clarifier on far right.
06/10/2011

Photo 4
Aerated stabilization basins I and II (center) III (middle right) and
North Polishing Pond (bottom right), looking west.
06/10/2011

Photo 5
Aerated stabilization basins (I is white, draining into II), Pond 8 (emergency Spill Pond) on far left.
06/10/2011

Photo 6
Western edge of Pond 13 (treated wastewater storage) and Clark Fork River, looking east.
06/10/2011

Photo 7
Landfarm area, looking southeast.
06/22/11

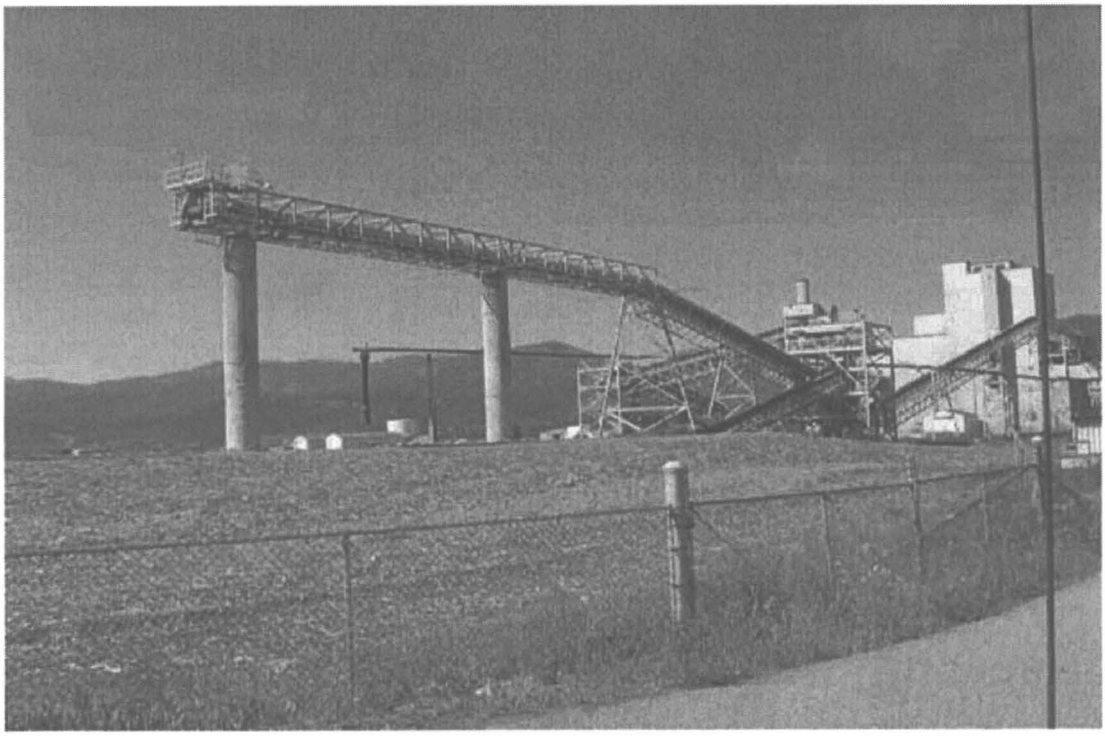


Photo 8
Hog fuel area, looking southwest.
06/22/11

Photo 9
Hog fuel unloading area (blue frame), looking northeast.
06/22/11

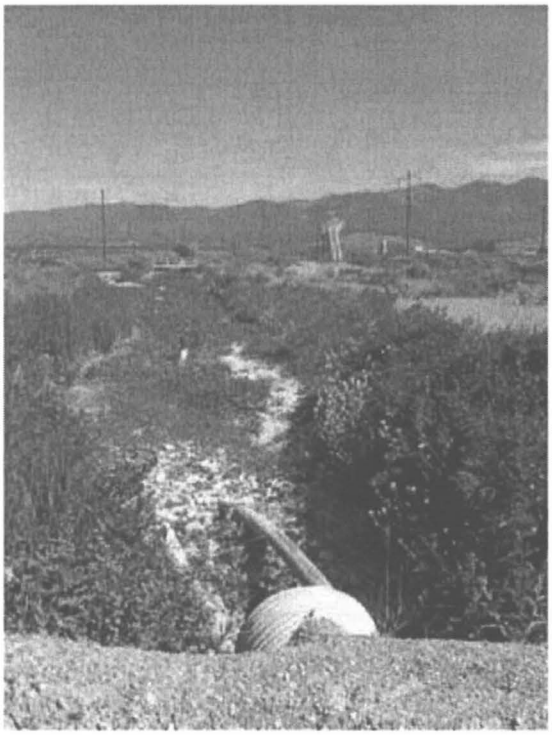


Photo 10
Cooling water ditch (non-contact process water). Black pipe is return flow from color removal facility to mill. Looking northwest.
06/22/11

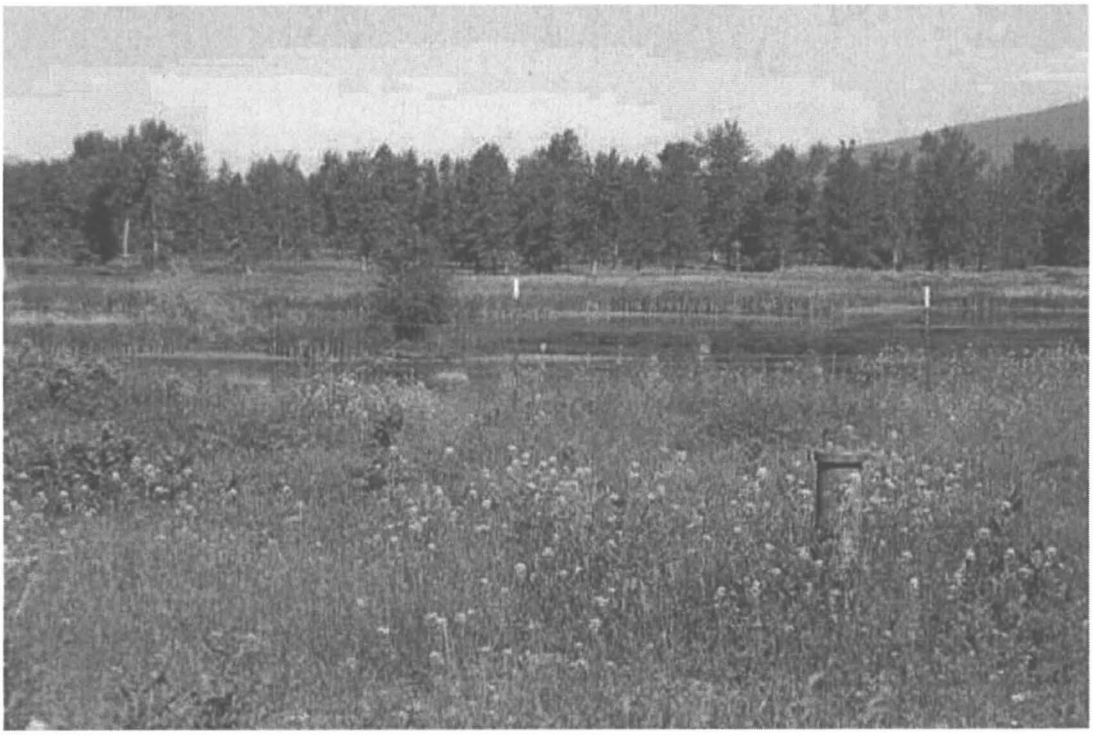


Photo 11
Monitoring well SMW7 and wetlands along north of property, looking northwest.
06/22/11

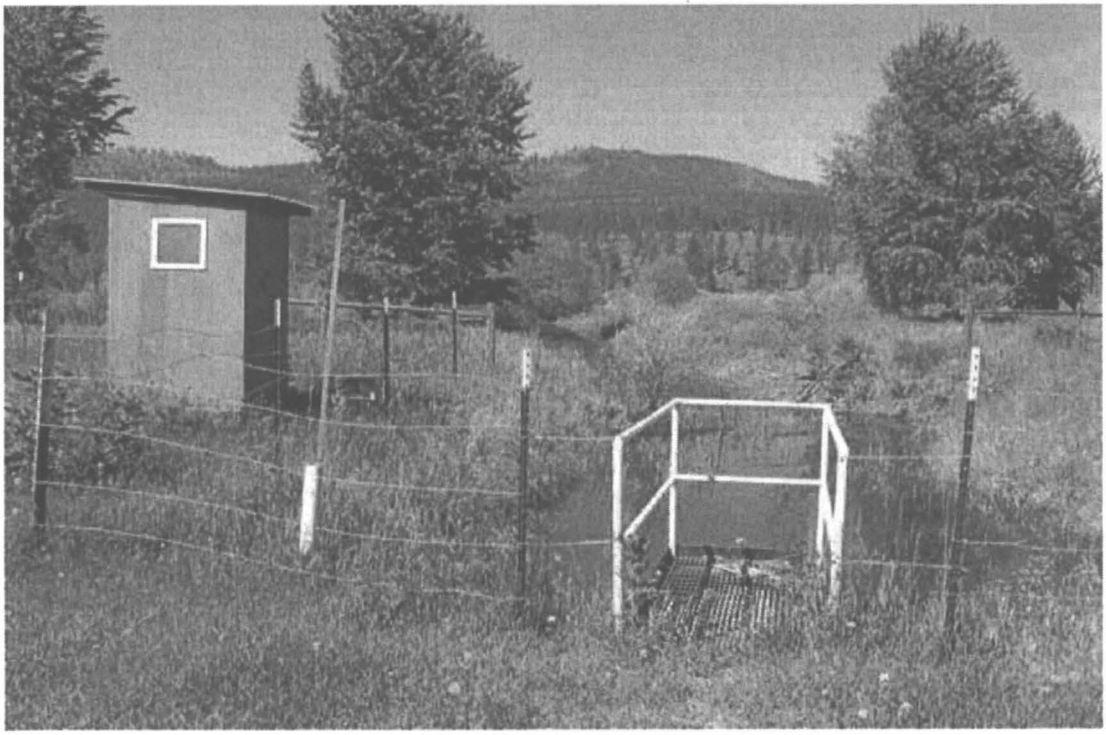


Photo 12
Cooling water ditch outfall (outfall #4) and monitoring station,
looking west toward Clark Fork River.
06/22/11

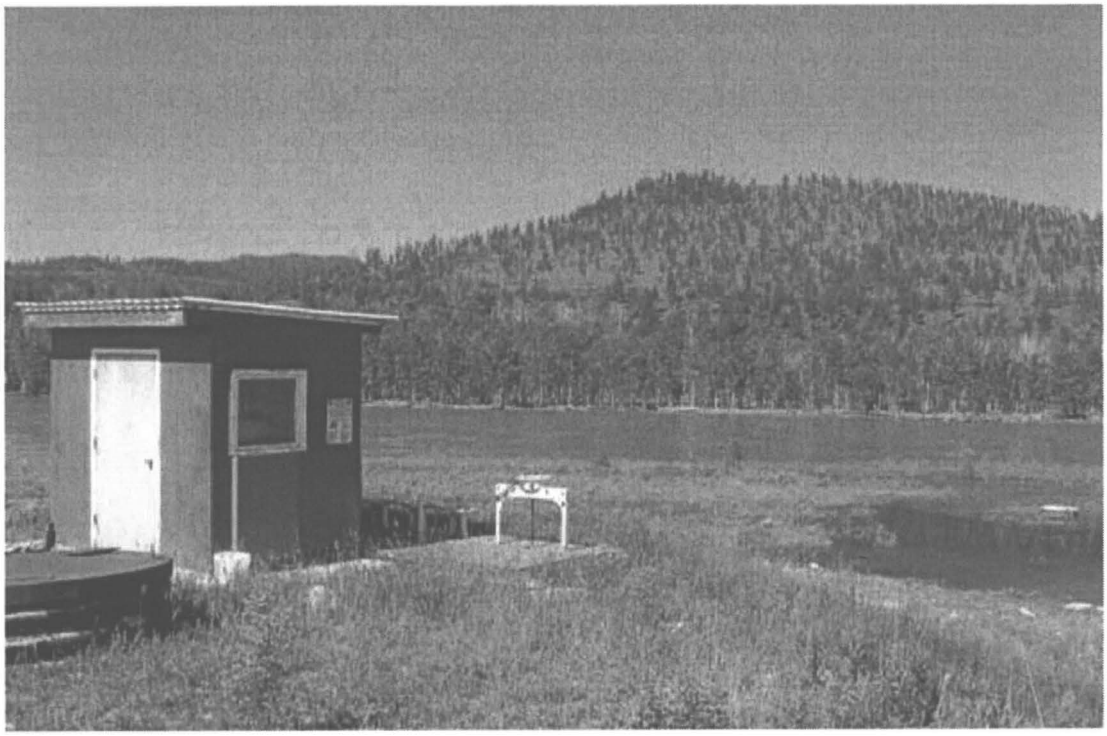


Photo 13
Outfall #3, Clark Fork River in background, looking west.
06/22/11

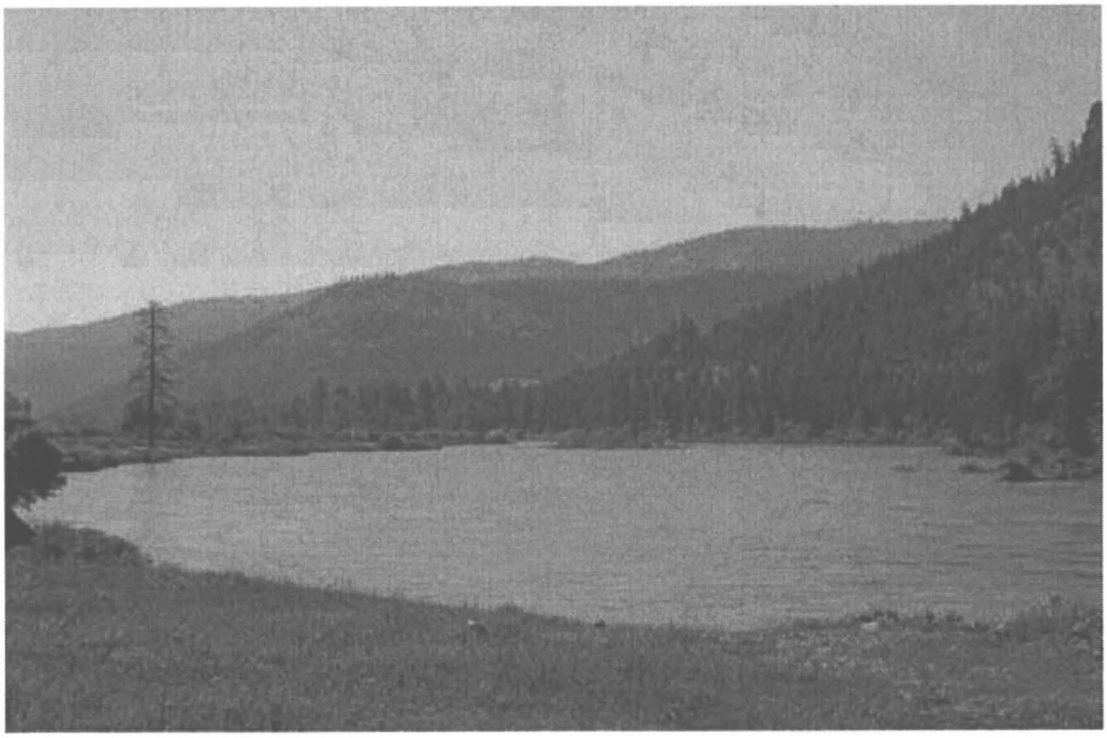


Photo 14
Clark Fork River along west side of mill property, looking south (upstream).
06/22/11

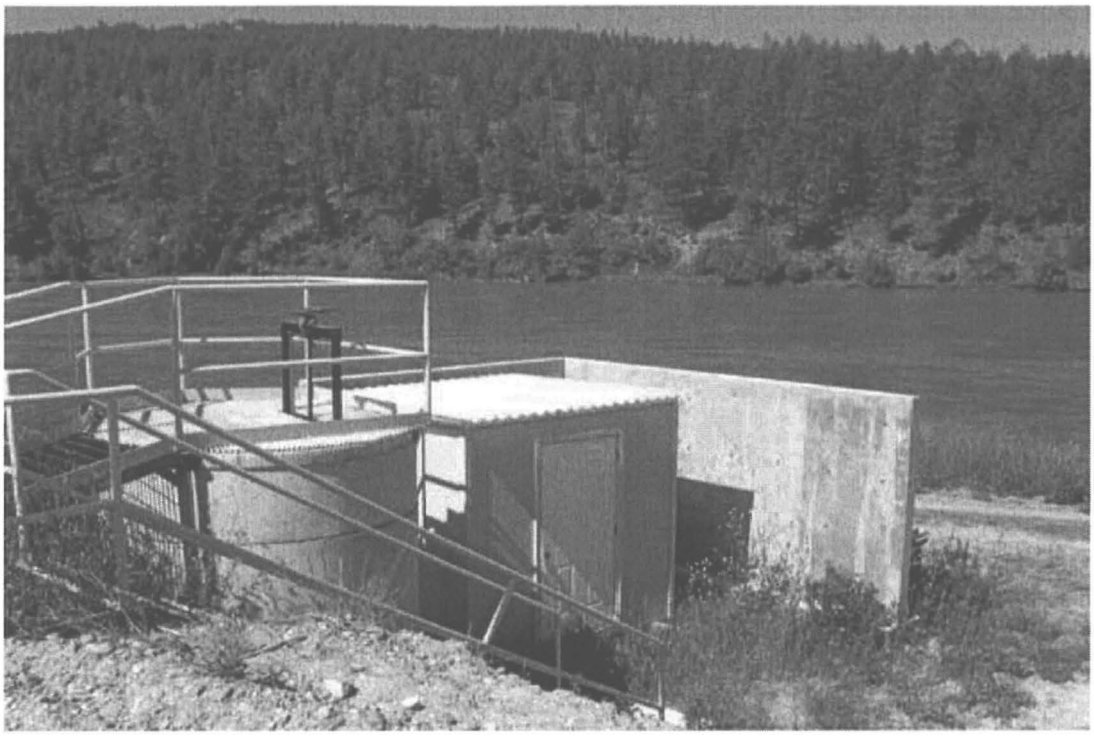


Photo 15
Outfall #1, Clark Fork River in background, looking west.
06/22/11

Photo 16
O'Keefe Creek running through property south of Pond 17, looking northeast.
06/22/11

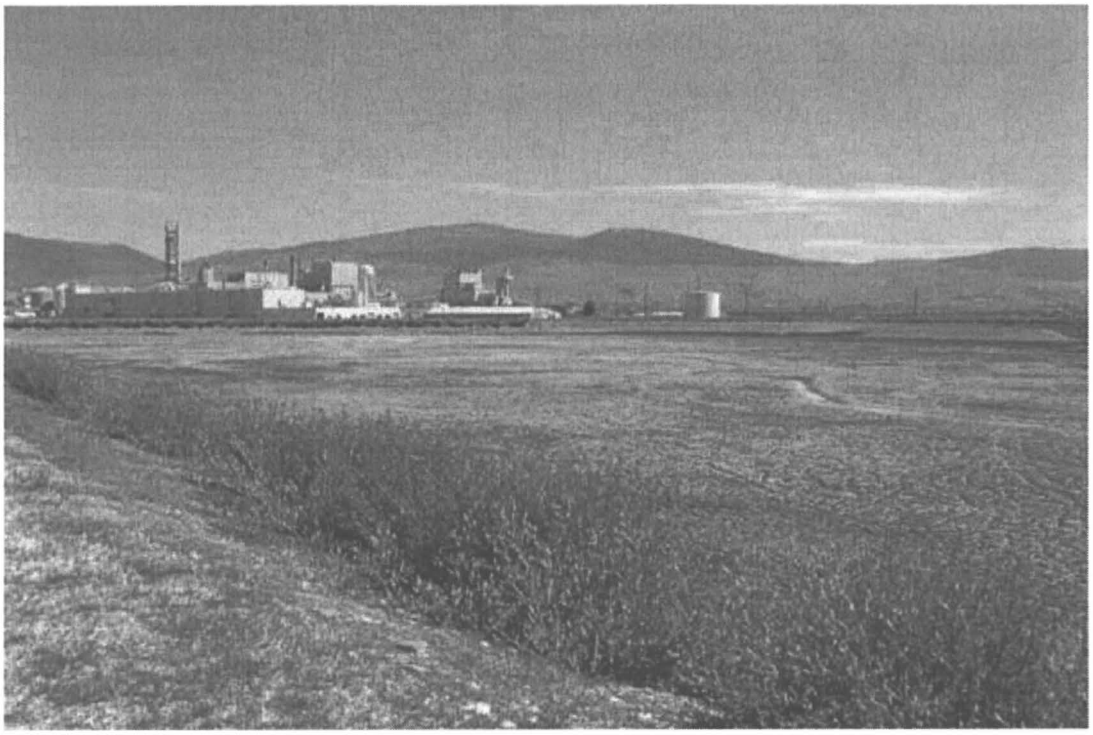


Photo 17
Pond 17 (sludge and fly ash), looking north towards mill.
06/22/11

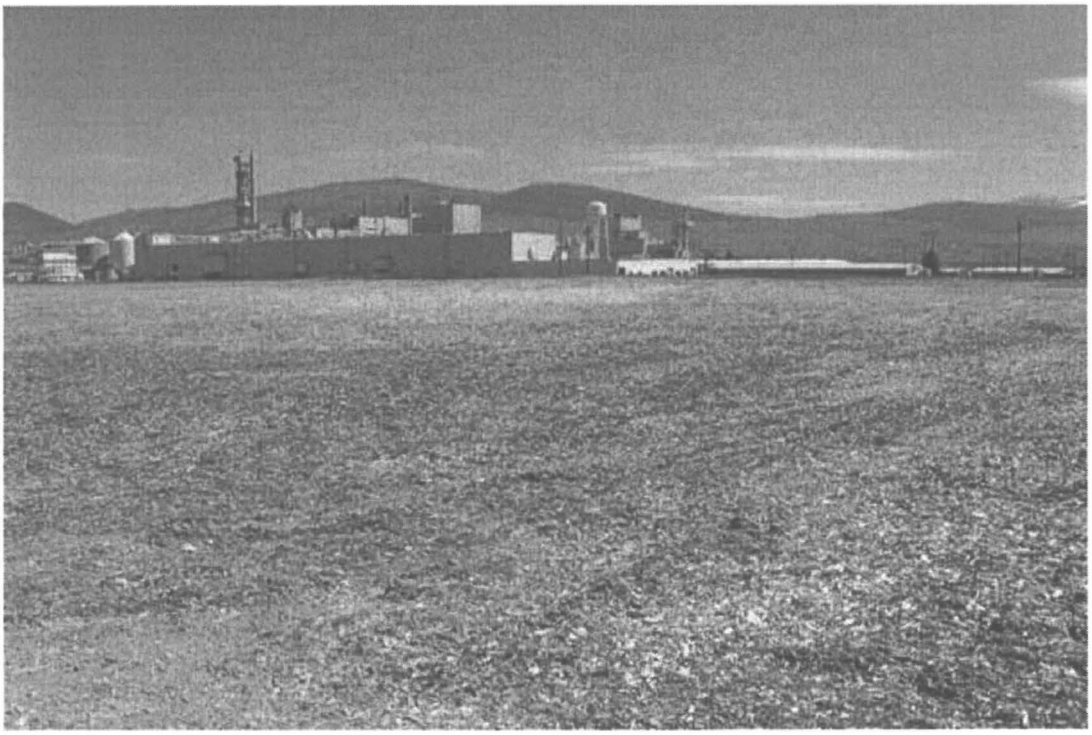


Photo 18
Pond 3 (sludge) covered with 10-12" of wood chips for dust suppression,
looking northeast towards mill.
06/22/11

Photo 19
Pond 5 (sludge), looking northwest.
06/22/11

Photo 20
Original facility landfill (slightly humped area in bottom center of photo),
aka Pond A, looking northeast.
06/22/11

Photo 21
Pond 4, oldest sludge pond (received sludge the longest), pale color due to sun-bleaching of wood fiber on surface, looking west.
06/22/11

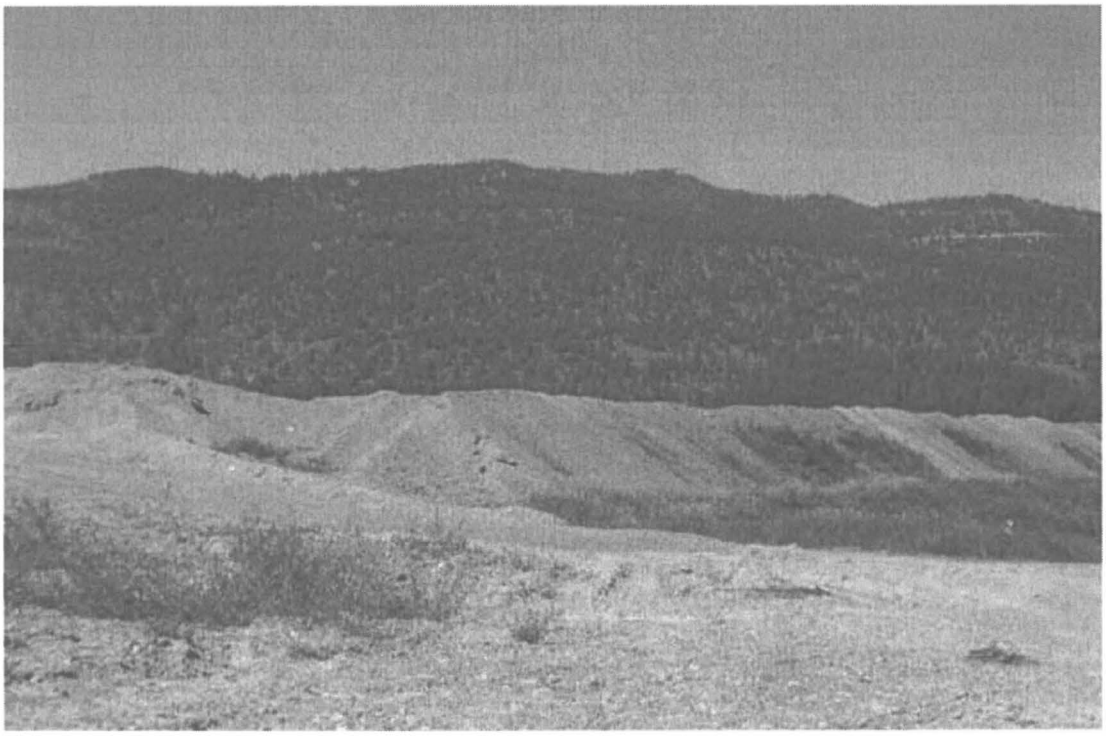


Photo 22
'Bottom ash' pile, forms north berm of Pond 4, looking west.
06/22/11

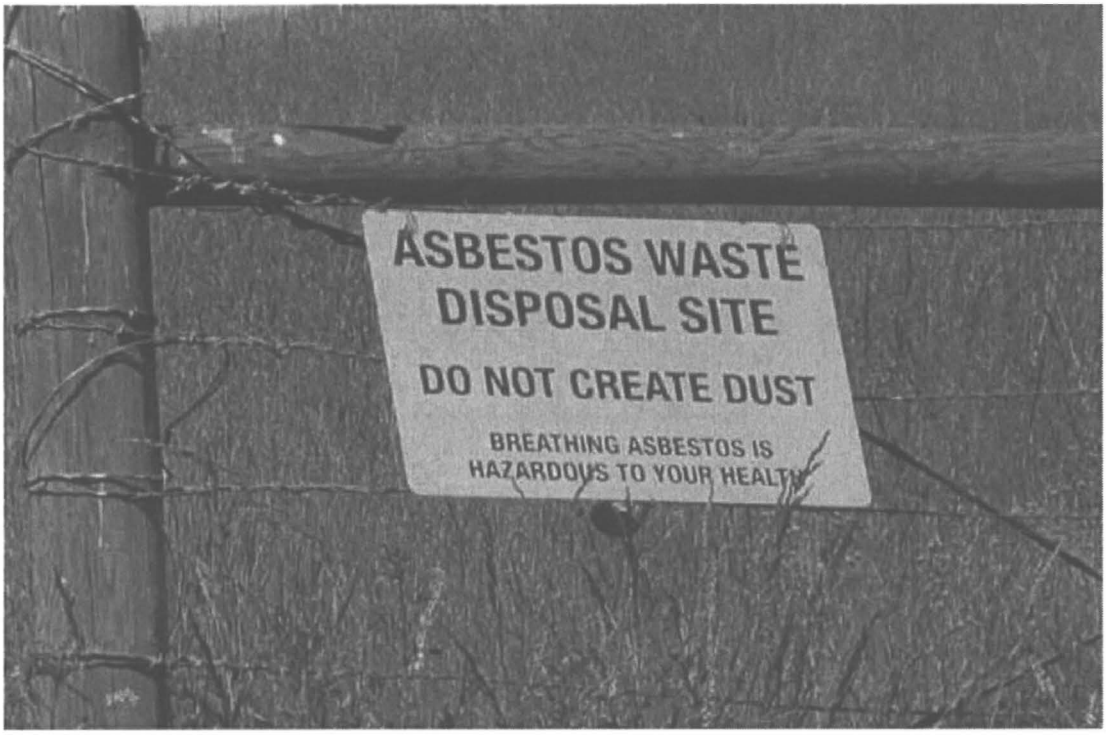


Photo 23
Asbestos waste disposal site (Area 'F') sign, north of Pond 4, looking northwest.
06/22/11

Photo 24
Pond 8 (Emergency spill pond), looking west.
06/22/11

Photo 25
Pond 8 (Emergency spill pond), looking northwest.
06/22/11

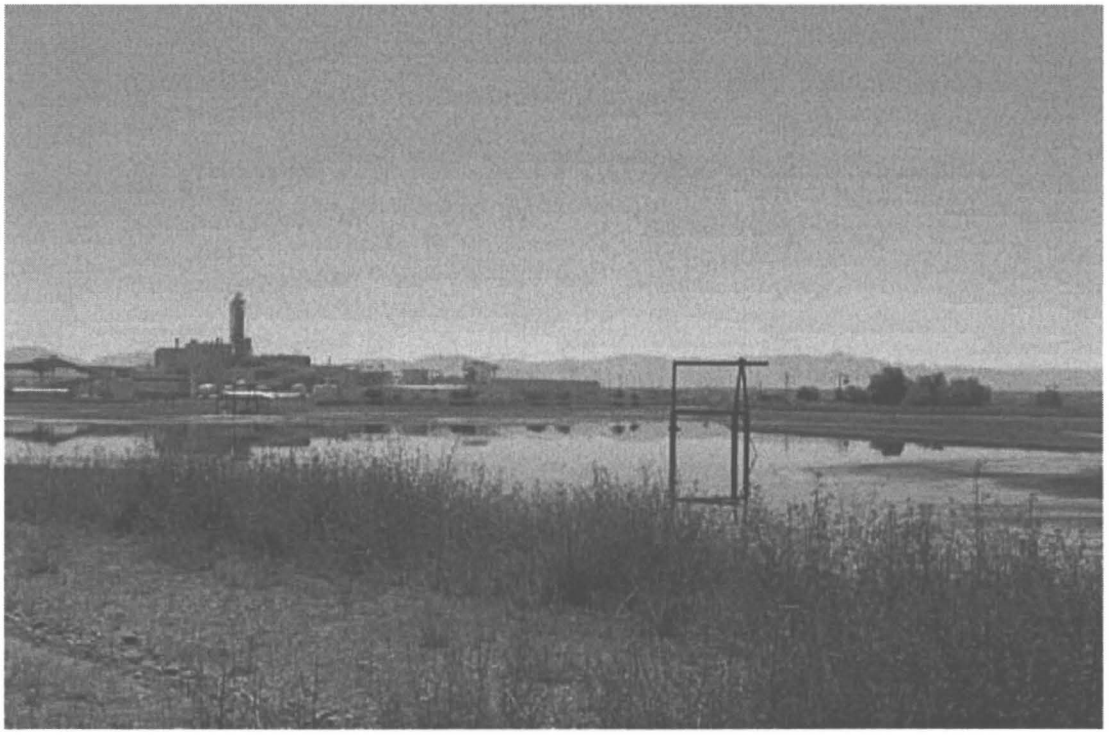


Photo 26
Treated Wastewater Aeration basin II, looking southeast back towards the mill.
06/22/11

Photo 27
Pond 8 (Emergency spill pond) showing breach in northwest corner, looking west.
06/22/11

Photo 28
Pond 9 (treated wastewater storage) showing regrowth of vegetation, looking west.
06/22/11

Photo 29
'Bone yard' (disused equipment storage area), looking west.
06/22/11

Photo 30
Pond 8 (Emergency spill pond), looking northwest.
06/22/11

Photo 31
Pond 8 (Emergency spill pond) 'dry cell' (area kept in reserve until needed), looking northwest.
06/22/11

Photo 32
Overflow ditch from effluent clarifier, with bottom ash berm of Pond 4, looking southeast.
06/22/11

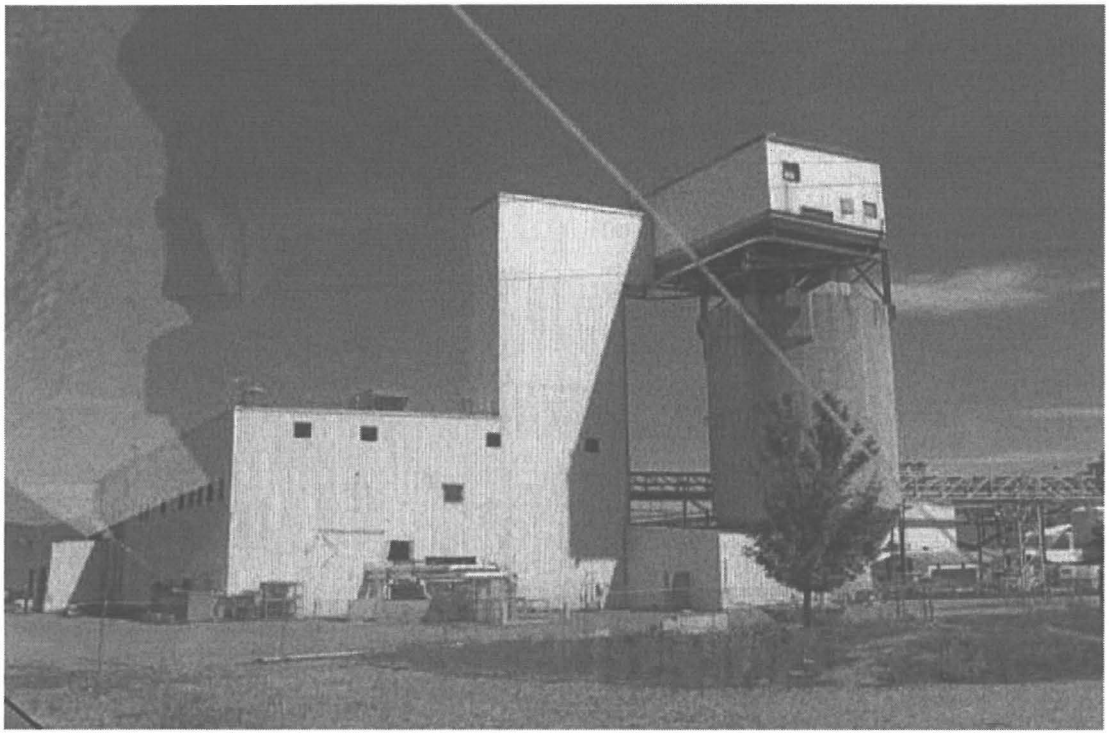


Photo 33
Old Cardboard Container (OCC) facility, looking north.
06/22/11

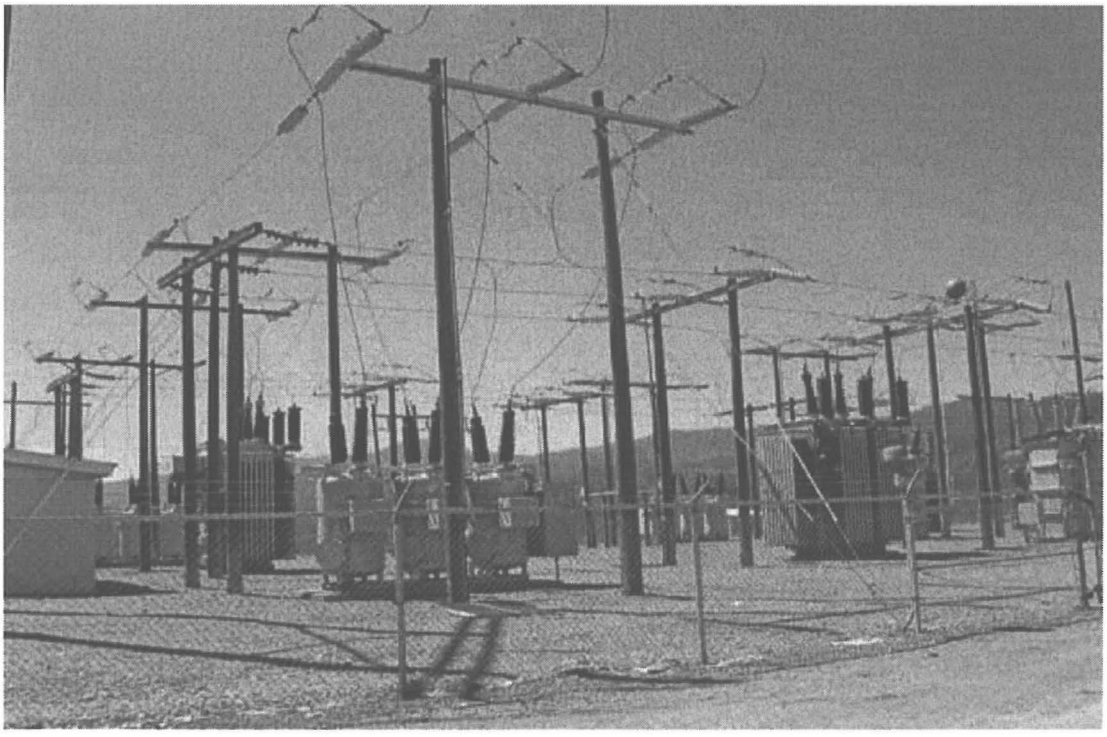


Photo 34
Northwest Energy substation, looking south.
06/22/11

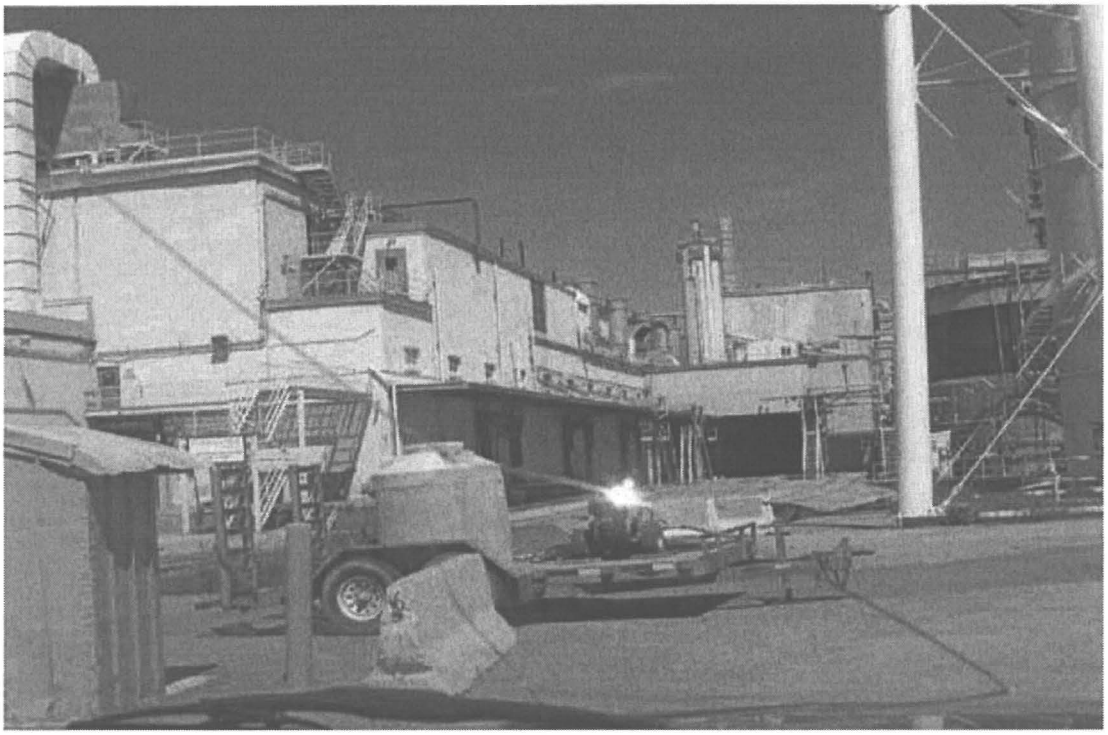


Photo 35
Chemical unloading area (note train tracks), (chlorine plant is behind this area), looking north.
06/22/11

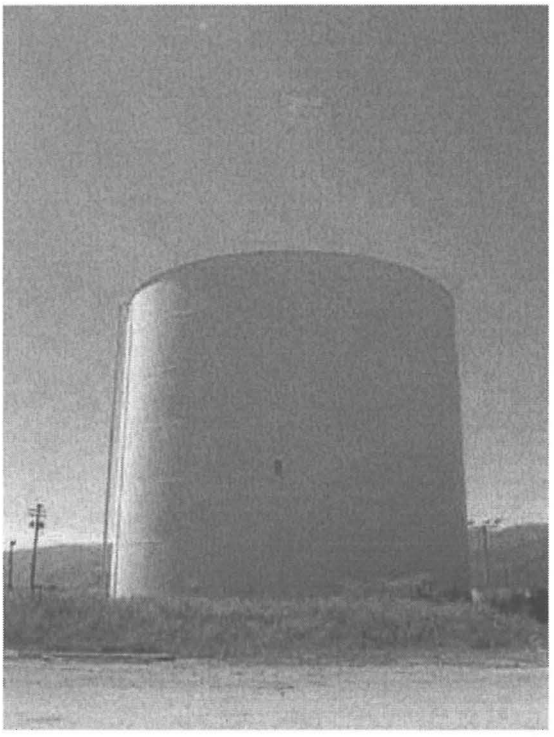


Photo 36
One million gallon #6 fuel oil AST (abandoned pre-1989), looking south.
06/22/11

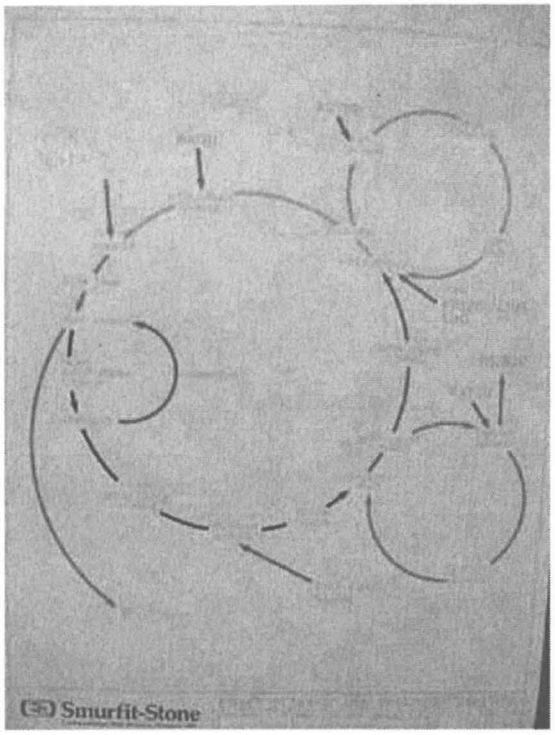


Photo 37
Smurfit-Stone kraft pulping and recovery process diagram, dated 10/11/1996.
06/22/11

Photo 38
View of front of facility, looking southwest.
06/22/11

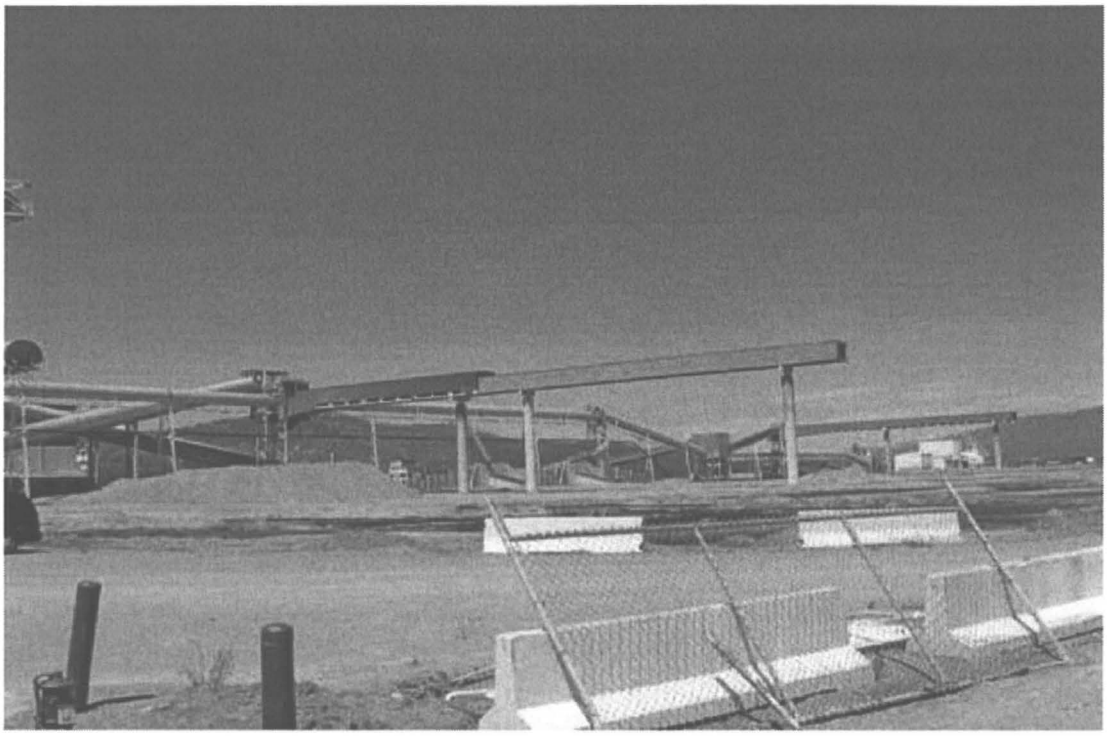
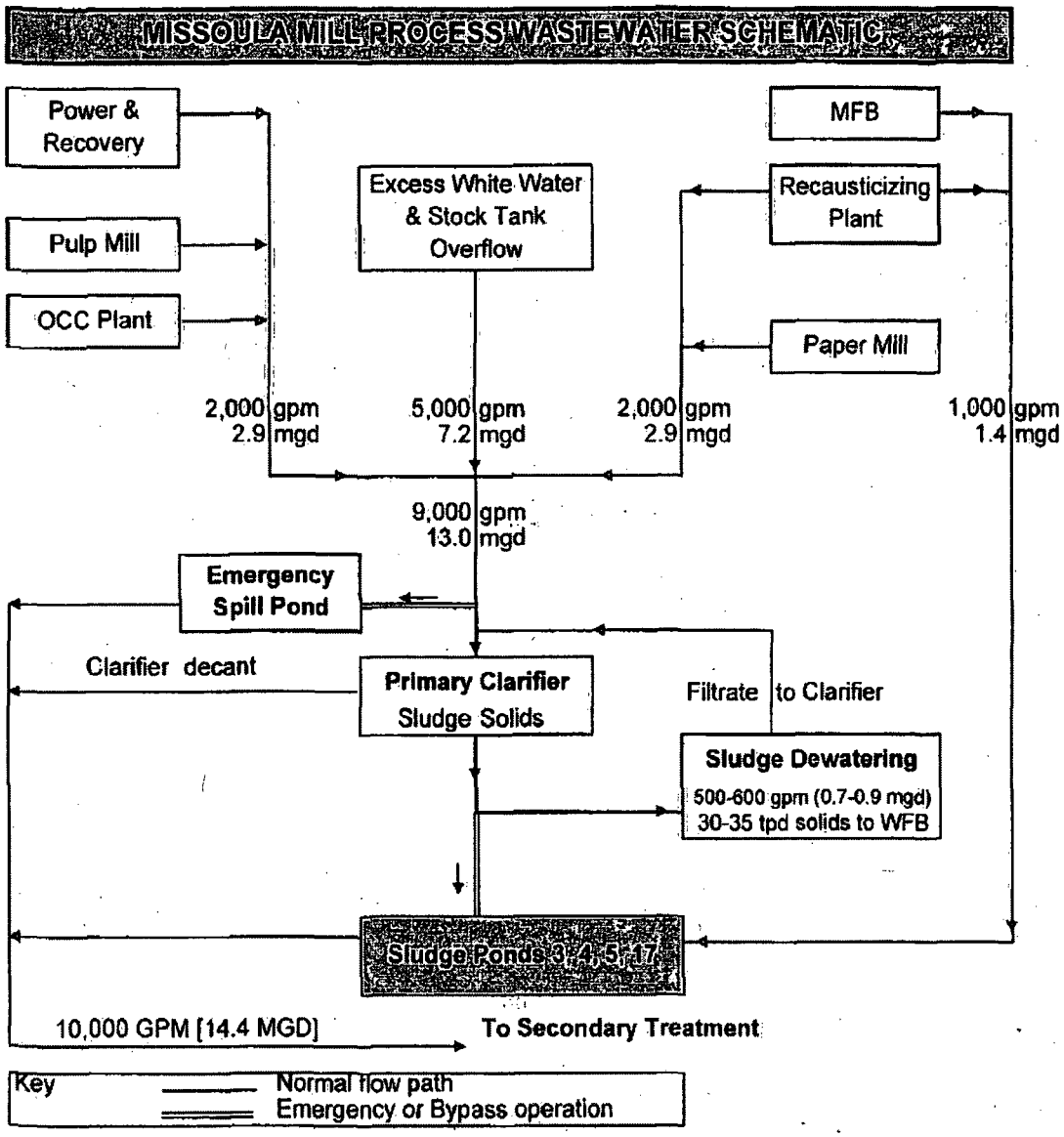


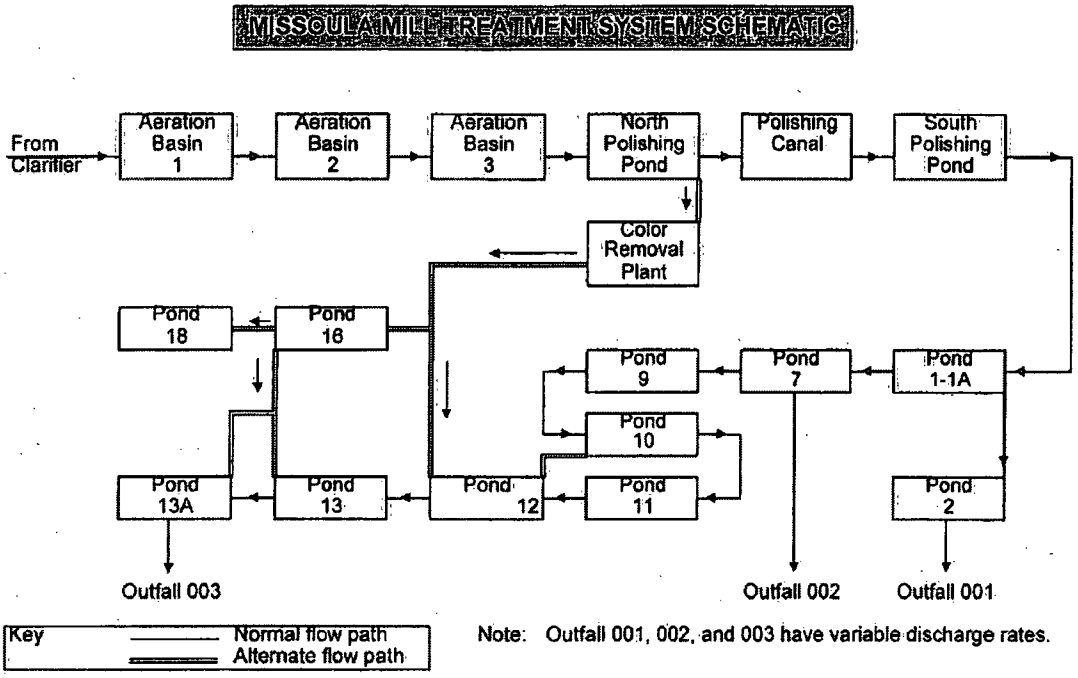
Photo 39
View of woodchip staging area, looking northwest.
06/22/11

APPENDIX E

Wastewater Flow Diagrams



Source: Smurfit-Stone Container Enterprises, Inc. Missoula Mill. 2004. Application for renewal of Wastewater Discharge Permit No. MT-0000035. November 2004.



Source: Smurfit-Stone Container Enterprises, Inc. Missoula Mill. 2004. Application for renewal of Wastewater Discharge Permit No. MT-0000035. November 2004.

APPENDIX F

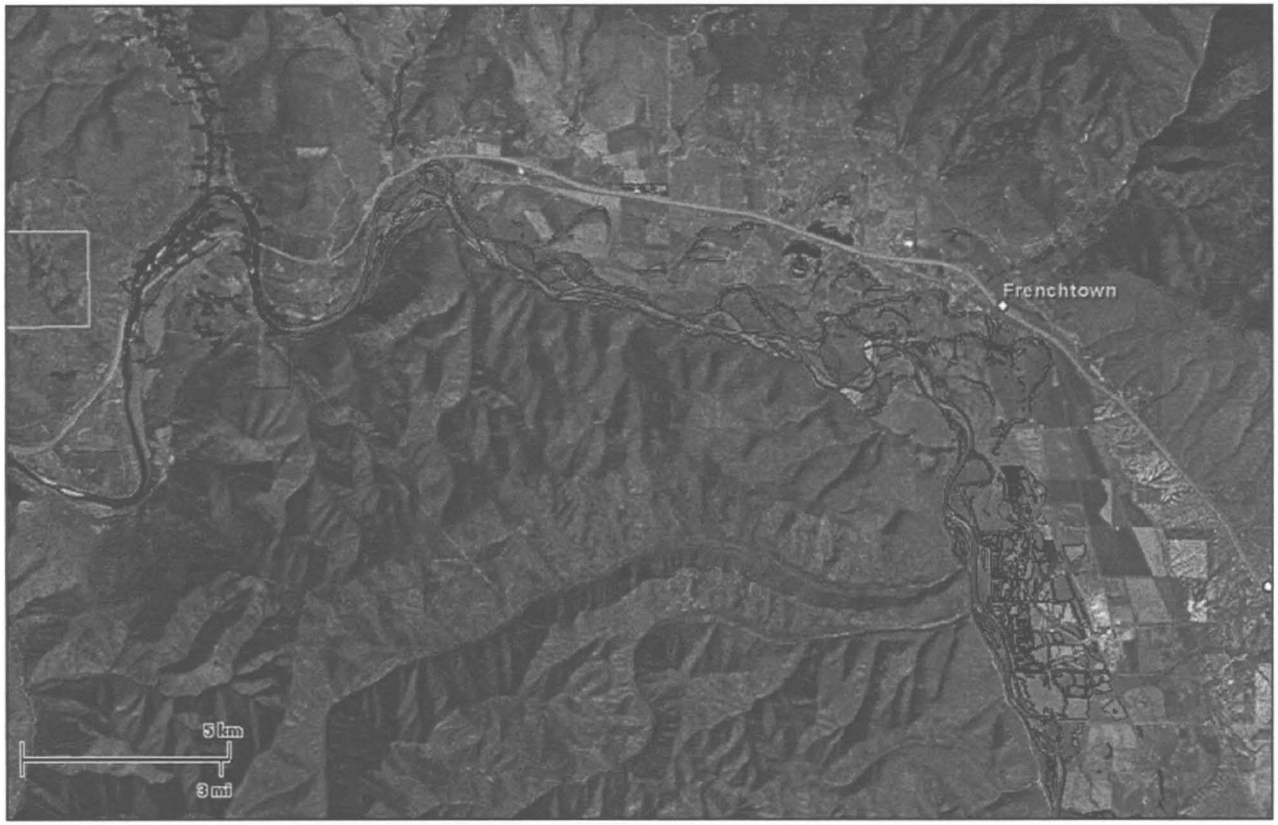
National Wetlands Inventory Map for the TDL

U.S. Fish and Wildlife Service

National Wetlands Inventory

TDL-Smurfit-Stone

Jul 6, 2011



Wetlands

- Freshwater Emergent
- Freshwater Forested/Shrub
- Estuarine and Marine Deepwater
- Estuarine and Marine
- Freshwater Pond
- Lake
- Riverine
- Other

Riparian

- Herbaceous
- Forested/Shrub

User Remarks: